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1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA
3

4 JONATHAN C. KALTWASSER, on
5 behalf of himself and all others similarly
6 situated,

7 Plaintiffs,

8 v.

9 AT&T MOBILITY LLC f/k/a CINGULAR
10 WIRELESS LLC,

11 Defendant.

CASE NO. 5:07-cv-00411-JF

**STIPULATION FOR ORDER CHANGING
TIME PURSUANT TO NORTHERN
DISTRICT LOCAL RULE 6-2**

12 **STIPULATION**

13 **WHEREAS**, Plaintiff Jonathan C. Kaltwasser ("Plaintiff") filed the above-entitled action
14 in the United States District Court for the Northern District of California on January 22, 2007 and
15 served Defendant on January 29, 2007;

16 **WHEREAS**, under applicable rules, and pursuant to the parties previous stipulation, the
17 Defendant must answer, move against, or otherwise respond to the Complaint no later than March
18 19, 2007;

19 **WHEREAS**, the parties desire to determine if they can reach a mutually acceptable
20 resolution through the exchange of information and negotiation.

21 **WHEREAS**, Defendant would like to preserve its ability to move to compel arbitration in
22 the case.

23 **WHEREAS**, under Northern District Local Rule 6-2, parties may file a stipulation
24 requesting an order changing time that would affect the date of an event or deadline already fixed
25 by Court order.

26 **WHEREAS**, the initial deadlines set forth in this case pursuant to the "Order Setting
27 Initial Case Management Conference and ADR Deadlines" are April 17, 2007 (ADR and meet
28

1 and confer); May 1, 2007 (26(f) report, Case Management Statement and Initial Disclosures); and
 2 May 8, 2007 (Initial Case Management Conference).

3 **WHEREAS**, the parties would like to stipulate to allow Defendant until May 30, 2007 to
 4 answer, move against, or otherwise respond to the Complaint (which includes moving to compel
 5 arbitration).

6 **WHEREAS**, the parties would like an order extending the deadlines for their ADR
 7 submission, 26(f) Report-Case Management Statement-Initial Disclosures, and Initial Case
 8 Management Conference for two months. The new deadlines would be: ADR papers and meet
 9 and confer by June 18, 2007; 26(f) report-Case Management Statement-Initial Disclosures by July
 10 2, 2007, and the Initial Case Management Conference to be scheduled in July 2007.

11 **THEREFORE, IT IS HEREBY STIPULATED AND REQUESTED THAT**
 12 Defendant shall have until May 30, 2007 to answer, move against, or otherwise respond to the
 13 Complaint (which includes moving to compel arbitration). In addition, the following new
 14 deadlines would be put in place: ADR papers and meet and confer by June 18, 2007; 26(f) report-
 15 Case Management Statement-Initial Disclosures by July 2, 2007, and the Initial Case
 16 Management Conference to be scheduled in July 2007.

17
 18
 19 s/ Joseph N. Kravec, Jr. (PRO HAC VICE) (w/ express
permission)

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*Attorneys for Defendant ATT Mobility f/k/a Cingular
Wireless LLC*

PROOF OF SERVICE

I am a citizen of the United States and employed in the County of San Francisco, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 101 California Street, 41st Floor, San Francisco, California 94111.

On **March 7, 2007**, I electronically filed the:

***Stipulation for Order Changing Time Pursuant to
Northern District Local Rule 6-2; [Proposed] Order***

with the Clerk of the United States District Court - Northern District of California, via the Court's electronic court filing system (ECF). The Court will generate email notification to all attorneys of record participating in this case via ECF. Participating attorneys are:

David L. Balser, Esq., McKenna Long & Aldridge LLP
Nathan L. Garroway, Esq., McKenna Long & Aldridge LLP
Felicia Y. Feng, Esq., McKenna Long & Aldridge LLP
Ira Spiro, Esq., Spiro Moss Barness & Barge, LLP
Michael David Braun, Esq., Braun Law Group PC
Joseph N. Kravec Jr., Esq., Specter Specter Evans & Manogue PC

For those served by U.S. Mail, I am readily familiar with this firm's practice for collection and processing of correspondence for mailing with the United States Postal Service. On this date I placed with this firm at the above address for deposit with the United States Postal Service, a true and correct copy of the document stated above, in a sealed envelope, postage fully paid, addressed as follows:

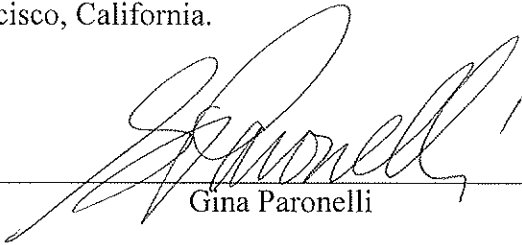
Janet Lindner Spielberg, Esq.
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Following ordinary business practices, the envelope was sealed and placed for collection and mailing on this date, and would, in the ordinary course of business, be deposited with the United States Postal Service on this date.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

STIPULATION FOR ORDER CHANGING TIME
PURSUANT TO LOCAL RULE 6-2
CASE NO. 5:07-CV-411 JF

Executed on **March 7, 2007**, at San Francisco, California.


Gina Paronelli

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E-filed 3/9/07

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JONATHAN C. KALTWASSER, on
behalf of himself and all others similarly
situated,

Plaintiffs,

v.

AT&T MOBILITY LLC f/k/a CINGULAR
WIRELESS LLC,
Defendant.


CASE NO. 5:07-cv-00411-JF

**[PROPOSED] ORDER CHANGING TIME
PURSUANT TO NORTHERN DISTRICT
LOCAL RULE 6-2**

For good cause shown and to encourage resolution and exchange of information between the parties, Defendant shall have until May 30, 2007 to answer, move against, or otherwise respond to the complaint (which includes moving to compel arbitration).

In addition, the following new deadlines are established:

- 1) ADR papers and meet and confer by June 18, 2007;
- 2) 26(f) report-Case Management Statement-Initial Disclosures by July 2, 2007; and
- 3) The new date for the Initial Case Management conference is July 13 2007.


The Honorable Jeremy Fogel
United States District Court
Northern District of California

SF:27235487.1